

September 6, 2012

VIA Courier

Document Processing Desk (PRD)
Office of Pesticide Programs (7508P)
U.S. Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 South Crystal Drive
Arlington, Virginia 22202-4501

Attn: Russell Wasem

**RE: Chemical # 129099 Imidacloprid
ID# RR-129099-30160**

Luanne Jeram
Regulatory Affairs, MPP
111 RIDC Park West Drive
Pittsburgh, PA 15275-1112
Phone 412-809-4773

Luanne.jeram@lanxess.com
www.US.LANXESS.com

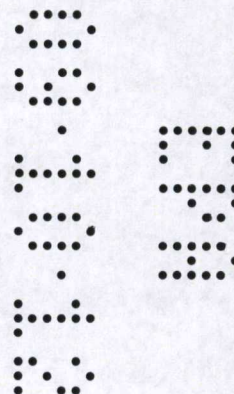
Dear Mr. Wasem,

We are submitting the following study "Determination of Dislodgeable Imidacloprid Residues from Spruce and Southern Yellow Pine (SYP) Boards Pressure Treated with Formulation JJT 4929-1", to fulfill the requirement for data on post application exposure to imidacloprid treated (outdoor) wood. This is a modified version of the indoor surface residue dissipation study (guideline 875.2300) based on a protocol reviewed by the EPA.

This study was conducted in accordance with a protocol reviewed by the EPA and found to be consistent with Subdivision N guidance. The letter dated May 13, 2011 from the EPA regarding the protocol is attached for your review.

Two comments were raised in the EPA letter requiring that additional information be provided. In follow up communications with the Agency it was determined that the additional information requested should be included in the final report and attachments.

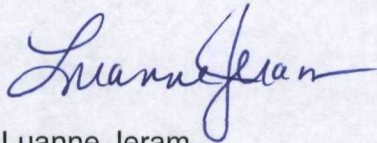
1) The additional information requested regarding details of the treatment process are included in Appendix IV (pages 93 through 106) of the final report. The information specific to the pressure treatment conditions appear on pages 95 and 96. As outlined in the treatment process, vacuum was applied twice. The first vacuum removes air from the cylinder and wood cells and the second vacuum removes excess preservative solution from wood cells.



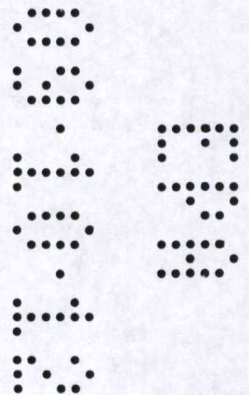
2) The retention rates used in the study were chosen to mimic commercial practice for products containing tebuconazole, triadimefon (or propiconazole) and imidacloprid. The retention rates used are consistent with ICC ESR (Building Code) and AWPA (American Wood Protection Association) for above ground use.

Please do not hesitate to contact me at 412-809-4773 if you have any questions or require additional information.

Sincerely,

A handwritten signature in blue ink, appearing to read "Luanne Jeram".

Luanne Jeram
Head, Regulatory Affairs, MPP NA



TRANSMITTAL DOCUMENT

Name and Address of Submitter:

LANXESS Corporation
111 RIDC Park West Drive
Pittsburgh, PA 15275-1112

**Regulatory action in support of
which this package is submitted:
EPA Reg. No./File Symbol:**

Response to Imidacloprid Data Call In
Chemical # 129099 Imidacloprid; ID# RR-129099-30160
39967-17

**Alternate Test Material Names:
Transmittal Date:**

JJT 4929-1
September 6, 2012

Volume No.	Administrative Materials
	Transmittal Document
	Cover Letter

Volume No.	Citation	MRID Number
1	Bestari, K.J, Determination of Dislodgeable Imidacloprid Residues from Spruce and Southern Yellow Pine (SYP) Boards Pressure Treated with Formulation JJT 4929-1. Unpublished study by University of Guelph. 144 pages. (3 copies)	<div>48933601</div>

**Company Official:
Company Name:
Company Contact:**

Luanne Jeram
LANXESS Corporation
Phone: 412-809-4773
Fax: 412-809-1068
E-mail: Luanne.Jeram@lanxess.com

